



Boston Market Corporation
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August 15, 2005

Arthur Neal, Director, Program Administration
National Organic Program, USDA-AMS-TMP-NOP
1400 Independence Ave., SW.
Room 4008-So., Ag Stop 0268
Washington, DC 20250

RE: Docket Number TM-04-07
Sent Via E-Mail to National.List@usda.gov
Sent Via fax to 202-205-7808

Dear Mr. Neal

Boston Market Corporation appreciates the opportunity to comment on the National Organic Program Sunset Review published in the Federal Register on July 17, 2005; Docket Number TM-04-07. The National Organic Standards Board that developed the National Organic Program was made up of knowledgeable experts who worked very hard to review the substances that were included on the National List of Allowed and Prohibited Substances. Because the original review was thorough and since there have been no significant developments affecting substances on the list, Boston Market Corporation supports the continuance of the current list published in 7 CFR 205.605. In particular we support the inclusion of the following substances, all of which are on the current list:

Nonsynthetic substances including:

Lactic, citric, alginic and other acids produced by microbial fermentation.

Enzymes a) Animal derived enzymes such as rennet, catalase, lipase, pancreatin, pepsin and trypsin

b) Derived from nontoxic plants

c) Derived from nonpathogenic fungi and bacteria

Nonsynthetic salts of calcium such as calcium carbonate, calcium chloride, calcium citrate and calcium phosphate(s)

Nonsynthetic Colors such as paprika and annatto

Natural Flavors (As defined in 21 CFR 101.22)

Sodium bicarbonate (Baking soda)

Yeast such as baker's yeast

Lecithin (from soybeans)

Pectin (found in fruit and jellies)

Cornstarch

Alginates (as thickening agents)
Leavening agents as listed in 7 CFR 205.605
Ascorbic acid (Vitamin C)
Potassium acid tartrate (Cream of tartar)
Tocopherols derived from vegetable oil (Natural forms of vitamin E)

These substances are all common food ingredients with long histories of safe use and are vital to the preparation of healthful organic foods and suitable alternatives are not available. We believe that the thorough work of the National Organic Standards Board that lead to the inclusion of these substances on the National List (7 CFR 205.605) should serve as sufficient documentation for their continued presence on the list. We strongly urge retention of these items on the list of allowed substances for use in organic foods. Your consideration of these comments is greatly appreciated.

Sincerely,



Evelyn Cadman
Nutrition and Labeling Specialist
Department of Food Safety and Quality Assurance